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RECEIVED

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March 26, 1998

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N. W. – Room 222
Washington, D. C. 20554

RM-9101
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte, CC Docket No. 96-98/RM 9101 – Implementation of the Local
Competition Provisions of the Telecommunications Act of 1996

Dear Ms. Roman Salas:

On Thursday, March 25, 1998 Karen Weis and I met with Kyle Dixon, Legal Advisor to Commissioner Powell. The purpose of the meeting was to review a process for implementing operations support system ("OSS") performance measurements and reporting requirements. This process would be used to determine the quality of the OSS and OSS access provided by incumbent LECs both to competitive LECs and to themselves.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

A handwritten signature in cursive script, appearing to read "F. S. Simone".

ATTACHMENTS

cc: K. Dixon

STEPS FOR REPORT CREATION and COMPLIANCE DETERMINATION

1--Data Collection

2--Compute Data Used In Measurement Results

3--Compute Statistical Results & Make Performance Measurement Comparisons;

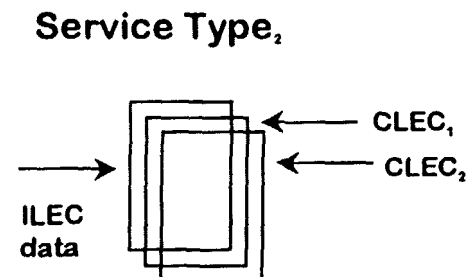
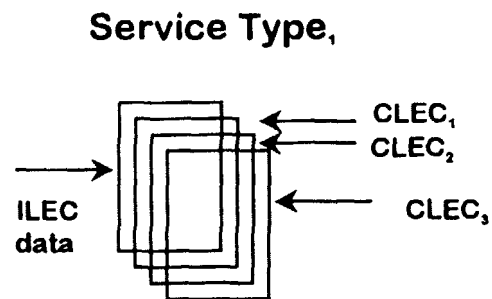
Determine ILEC Compliance With Nondiscrimination Obligations

4--Report Generation

STEP 1 DATA COLLECTION

- Data identified and collected across LCUG service performance measurements and across reporting dimensions
- Data is collected for ILEC and each CLEC

Example -- FOC Interval by reporting dimension (Service Type)



STEP 2 COMPUTE DATA USED IN MEASUREMENT RESULTS

Example for :

**Completion Interval (days) = Service Order Completion Notification -
Service Order Receipt by ILEC**

**Reporting Dimension example: Resold POTS, New Service
Installation**

Done for each occurrence by Reporting Dimension

STEP 3 COMPUTE STATISTICAL RESULTS AND MAKE PERFORMANCE MEASUREMENT COMPARISONS

Parity requires comparison of measured results

Room for error in measurements needs to be accounted for

ILEC compliance can be determined by calculating number of failed measurements compared to pre-selected threshold

STEP 4 REPORTS

Three Report Formats Proposed

1--Summary reports

- . Shows Threshold For Number Of Failed Tests**
- . Used To Determine Compliance**
- . Report To Commissions**

2--Exception Report Provides Detail On Failed Measurements

- . Identifies Areas In Which ILEC Needs To Implement Performance Improvement Plan**

3--Individual CLEC Reports Used By CLEC For Internal Analyses

Regulatory Summary Report
Performance Measurement Compliance Summary Report
Aggregate CLEC Summary - Report Period: May 1998

	Measurements Failed This Period($\alpha=.0474$, $c=1.6708$)
Total Comparisons of Measurement/Reporting Dimension Combinations for the specified time period	300
Threshold	20
Number of Failed Comparisons	26
Compliance Assessment	ILEC Performance Measurements Not In Compliance